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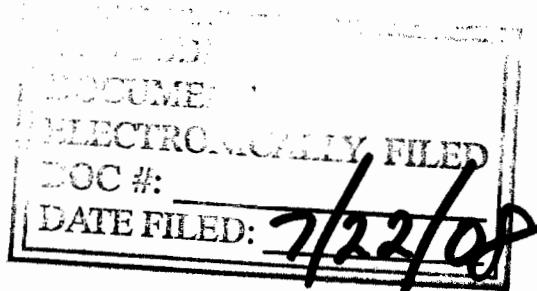
MATTHEW H. COHEN*
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July 3, 2008

*ADMITTED IN NY & NJ
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VIA HAND DELIVERY

Hon. Gerard E. Lynch
 United States District Judge
 United States Courthouse
 500 Pearl Street
 Room 910
 New York, New York 10007



**Re: Samuel A. Judd v. Take-Two Interactive Software, Inc.
 07 Civ. 7932 (GEL)
 Our File No. 2923.01**

Dear Judge Lynch:

We represent the plaintiff in the above-referenced action. I write, however, on behalf of both parties to request that Your Honor extend the time for completion of discovery through October 31, 2008. The current deadline for completion of discovery is July 11, 2008.] *

I report that during the last month counsel for both parties have cooperatively communicated regularly, both by telephone and in writing, concerning their respective discovery concerns. When we expressed our concern that the discovery being obtained and provided was resulting in their both parties' having to review too many documents that are cumulative and (particularly as such) of little probative value, counsel together worked on a plan for limiting what the defendant would be requested to search for and produce. At our request, and in order to reduce the risk of unnecessary burden on both parties, the defendant suspended its search, review and production of documents during a two-week period during which we worked on the plan. (I had to work with my client on the plan and his availability was limited due to business travel and other commitments during that time.) The parties have now agreed on a document discovery plan sufficient to again move forward.

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While the parties also have a few discovery disagreements, they have been discussing and continue to work toward finding solutions without having to bring those issues to the Court's attention for resolution. We are hopeful, if not confident, that all of the "paper discovery" (including e-discovery) will be completed within a few weeks. Once the paper discovery is digested, we will begin taking depositions.

In proposing the October 31, 2008, discovery deadline, we have tried to fairly take into account that I am scheduled for a multi-day FINRA arbitration in early August, that I hope to take a week long summer vacation later that month, that summer vacation schedules often make August a difficult time for scheduling counsel and witnesses for depositions, and that there are a number of Jewish holidays in the early fall that I observe.

Counsel for the defendant having reviewed the above, joins in this request.

Respectfully submitted,

Gary Trachten (as)

Gary Trachten

GT/lw

cc: Thomas McKinney, Esq.
Ian Schaefer, Esq.
Kathleen McKenna, Esq.
Alisa Silverstein, Esq.

* The extension is granted. The post-discovery conference previously scheduled for July 25 is adjourned to Nov. 7, 2008, at 10:15 a.m. There will be no further extensions of discovery under any circumstances.

SO ORDERED

Gerard E. Lynch
GERARD E. LYNCH, U.S.D.J.

7/21/08